VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTH CENTRAL REGIONAL OFFICE

FACT SHEET
FOR PROPOSED PERMITTING ACTION
UNDER 9 VAC 5 Chapter 80 Article 1 (TITLE V-CLEAN AIR ACT)

APPLICANT:

VA-30549 AIRS ID 51-009-0022
Greif Bros. Corporation
P.O. Box 339
Amherst, VA 24521

FACILITY LOCATION:

861 Fibre Plant Road, Riverville, VA
UTM Coordinates are ZONE: 17 EASTING: 684.7 km NORTHING: 4153.4 km

FACILITY DESCRIPTION:

Greif Bros. Corporation is a manufacturer of semichemical corrugated medium and recycled liner board covered by Standard Industrial Classification (SIC) Code 2631. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The facility has one semichemical paper machine and one recycled paperboard machine, and associated process equipment. Two natural gas/residual oil boilers, one combination fuel boiler, one chemical recovery boiler, and one natural gas/distillate oil spare boiler provide the steam requirements to the facility.

EMISSIONS SUMMARY:

PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]	
CRITERIA POLLUTANTS	***2000 ACTUAL EMISSIONS***
Particulate Matter (PM10)	101
Nitrogen Oxides (NOx)	636
Sulfur Dioxide (SO2)	816
Carbon Monoxide (CO)	2,480
Volatile Organic Compounds (VOC)	304

TITLE V PROGRAM APPLICABILITY BASIS:

This facility has the potential to emit greater than 100 tons per year of Particulate Matter (PM-10), Nitrogen Oxides (NOx), Sulfur Dioxide (SO2), Carbon Monoxide (CO), and Volatile Organic Compounds (VOCs). In addition, this facility has the potential to emit greater than 10 tons per year of a single Hazardous Air Pollutant, and 25 tons per year of combined Hazardous Air Pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of a criteria pollutant and 10/25 tons per year of HAPs, Greif Bros. Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 9 VAC 5 Chapter 80 Article 1.

APPLICABLE REGULATIONS/EXISTING PERMITS

FUEL BURNING EQUIPMENT

North and South Package Boilers. The B&W Package Boiler – North (Ref. No. BLR01) and the B&W Package Boiler – South (Ref. No. BLR02), each fired by natural gas and residual oil, were constructed in 1975. They each have a maximum rated capacity of 224.6 MMBtu/hr.

Because these two boilers were in operation at the facility prior to October 5, 1979, the applicable emission limits for these two boilers are set forth in 9 VAC 5 Chapter 40, Part II, Article 8, Emission Standards for Fuel Burning Equipment. The opacity limits for these boilers, however, are set forth in 9 VAC 5-50-80, because the two boilers were constructed after March 17, 1972. The B&W Package Boiler – North (Ref. No. BLR01) and the B&W Package Boiler – South (Ref. No. BLR02) share a common stack.

Emission Limits. Based on the Sulfur Dioxide (SO_2) and Particulate Matter (PM) standards set forth in 9 VAC 5-40-930 and 9 VAC 5-40-900, respectively, the emission limits for the B&W Package Boiler – North (Ref. No. BLR01) and the B&W Package Boiler – South (Ref. No. BLR02) are 592.9 pounds of SO_2 per hour and 0.22 pounds of PM per MMBtu. These limits are placed in the Title V permit. There are no applicable annual emission limits on these two boilers.

Opacity. Based on the standard for visible emissions set forth in 9 VAC 5-50-80, the opacity limit for the B&W Package Boiler – North (Ref. No. BLR01) and the B&W Package Boiler – South (Ref. No. BLR02) is 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity. This limit is placed in the Title V permit.

Additional Requirements. On April 30, 1998, a permit was issued to construct and operate the Foster Wheeler Combination Boiler (Ref. No. BLR05), and at that time the source requested to install Low-NOx burners and flue gas recirculation for the B&W Package Boiler – North (Ref. No. BLR01). (Note: The flue gas recirculation is used only when natural gas is being fired in the unit.) Furthermore, in the April 30, 1998 permit, a fuel consumption limit for the B&W Package Boiler – North (Ref. No. BLR01) was also

included. Both of these requirements are carried forward into the Title V permit. The Title V permit also includes a condition stating that the approved fuels for the B&W Package Boiler – North (Ref. No. BLR01) and the B&W Package Boiler – South (Ref. No. BLR02) are natural gas and residual oil, and any change in fuel could require a permit. Finally, the Title V permit requires that the source, with respect to the B&W Package Boiler – North (Ref. No. BLR01) and the B&W Package Boiler – South (Ref. No. BLR02) and their respective air pollution control equipment, develop a maintenance schedule and maintain records of all maintenance and maintain an inventory of spare parts. In addition, the source is required to have available written operating procedures for the boilers and the respective air pollution control equipment, and train operators on the proper operation of all equipment.

Spare Package Boiler. The B&W Package Boiler – Spare (Ref. No. BLR03), fired by natural gas and distillate oil, was constructed in 1989. It has a maximum rated capacity of 100 MMBtu/hr. The boiler has a permit dated October 13, 2000. Because the boiler was constructed prior to June 9, 1989, NSPS Subpart Dc does not apply.

Emission Limits. The October 13, 2000 permit includes hourly emission limits on Particulate Matter (PM), PM-10, Sulfur Dioxide (SO_2), Nitrogen Oxides (NOx), Carbon Monoxide (CO) and Volatile Organic Compounds (VOCs) from the B&W Package Boiler – Spare (Ref. No. BLR03). In addition, the October 13, 2000 permit includes annual emission limits for SO_2 and NOx. These annual limits were developed to allow the source flexibility in the amount of each type of fuel consumed, while at the same time, ensuring that PSD review was not triggered. All of these emission requirements are carried forward into the Title V permit.

Opacity. The October 13, 2000 permit includes an opacity limit for the B&W Package Boiler – Spare (Ref. No. BLR03) of 20%, except for one six minute period in any one hour in which visible emissions shall not exceed 30% opacity. This requirement is carried forward into the Title V permit.

Additional Requirements. The October 13, 2000 permit includes a fuel consumption limit, as well as a maximum sulfur content on the distillate oil burned, to assure compliance with the annual emission limits for SO_2 and NOx. These requirements are carried forward into the Title V permit. Also, the B&W Package Boiler – Spare (Ref. No. BLR03) is required to be properly operated and maintained in order to minimize emissions; boiler operators must be trained in the proper operation of the B&W Package Boiler – Spare (Ref. No. BLR03).

Combination Boiler. 40 CFR Part 60 Subpart Db sets forth the New Source Performance Standard for boilers with maximum heat input capacities of greater than 100 MMBtu/hr which were constructed, modified, or reconstructed after June 19, 1984. The Foster Wheeler Combination Boiler (Ref. No. BLR05) has a maximum rated capacity of 244 MMBtu/hr. Because the Foster Wheeler Combination Boiler (Ref. No. BLR05) was issued a permit to construct and operate on April 30, 1998, and constructed in 2000, it fits the NSPS Db definition, and thus the requirements of 40 CFR Part 60 Subpart Db are applicable to this boiler. The Subpart's NOx standard for this unit which simultaneously fires

NG with wood, and MSW is 0.3 lb/MMBTU (30-day rolling average) UNLESS the unit has an annual capacity factor for NG of 10% or less. The April 30, 1998 permit restricts the annual usage of NG to less than 10%. Therefore, the mixed fuel boiler is NOT subject to the NOx standard of the Subpart. It follows that the mixed fuel boiler is NOT required to perform a NOx performance test nor to install a NOx CEM for this boiler.

The provisions of 40 CFR Part 60 Subpart Eb do not apply to the Foster Wheeler Combination Boiler (Ref. No. BLR05), because the April 30, 1998 permit limits the amount of Municipal Solid Waste in the fuel feed stream to 30% or less. As stated in the engineering review for the April 30, 1998 permit, of the fuels to be fired in the combination boiler, only OCCR and TDF are considered to fit the Subpart's definition of MSW. (Note: wood pallets and industrial process or manufacturing wastes are specifically excluded from the Subpart's definition of MSW. Therefore, woodwaste fuel (for example, bark or wood chips) is not MSW.)All of the preceding requirements are carried forward into the Title V permit.

Emission Limits. The April 30, 1998 permit includes an hourly emission limit on Cobalt, and both hourly and annual emission limits on Particulate Matter (PM), PM-10, Sulfur Dioxide (SO_2), Nitrogen Oxides (NOx), Carbon Monoxide (CO), Volatile Organic Compounds (VOCs), Formaldehyde, and HCl from the Foster Wheeler Combination Boiler (Ref. No. BLR05). These emission limits are carried forward into the Title V permit.

Opacity. The April 30, 1998 permit includes an opacity limit for the Foster Wheeler Combination Boiler (Ref. No. BLR05) of 10%, except for one six minute period in any one hour in which visible emissions shall not exceed 27% opacity. This requirement is carried forward into the Title V permit.

Additional Requirements.

The April 30, 1998 permit requires that the Foster Wheeler Combination Boiler (Ref. No. BLR05) be equipped with an Electrostatic Precipitator (ESP) that must be used for PM and PM-10 control when the boiler is operating. A Low-NOx burner is also required when burning natural gas, per the April 30, 1998 permit. These controls, along with the approved fuel definition condition and the fuel consumption limit for each fuel, assures compliance with the emission limits, and are carried forward into the Title V permit. Finally, the Title V permit requires that the source, with respect to the Foster Wheeler Combination Boiler (Ref. No. BLR05) and its respective air pollution control equipment, develop a maintenance schedule and maintain records of all maintenance and maintain an inventory of spare parts. In addition, the source is required to have available written operating procedures for the boiler and the respective air pollution control equipment, and train operators on the proper operation of all equipment.

The April 30, 1998 permit required initial performance testing of the Foster Wheeler Combination Boiler (Ref. No. BLR05). All of the required testing has been successfully completed, and so these initial testing requirements are not included in the current Title V permit.

PROCESS EQUIPMENT

Woodyard. The only applicable requirements for the woodyard are found in 9 VAC 5-50-90, Standard for Fugitive Dust/Emissions. These requirements are placed in the Title V permit.

Unbleached Pulp Mill. Because Greif Bros. Corporation is a semichemical pulping mill, the requirements of 40 CFR 63 Subpart S apply to certain portions of the facility. In the Unbleached Pulp Mill portion of this facility, the Low Volume, High Concentration system (LVHC) is the affected equipment. By definition the LVHC is the collection of equipment including the digester and evaporator systems, and any other equipment serving the same function. Greif Bros. will need to comply with 40 CFR 63 Subpart S no later than April 16, 2001. These requirements are set forth in the Title V permit.

Opacity. Because the Unbleached Pulp Mill was constructed after March 17, 1972, the opacity requirements given in 9 VAC 5-50-80 apply. These requirements (20% opacity limit, except for one six minute period in any one hour in which visible emissions shall not exceed 30% opacity) are set forth in the Title V permit.

Chemical Recovery. Because Greif Bros. Corporation is a semichemical pulping mill, the requirements of 40 CFR 63 Subpart MM apply to certain portions of the facility. In the Chemical Recovery portion of this facility, the "semichemical combustion unit" is the affected equipment. By definition the semichemical combustion unit is any equipment used to combust or pyrolyze black liquor at stand-alone semichemical pulp mills for the purpose of chemical recovery. For Greif Bros., the semichemical combustion unit is the B&W Recovery Boiler (Ref. No. CR05) and it will need to comply with 40 CFR 63 Subpart MM no later than March 13, 2004. These requirements are set forth in the Title V permit.

Furthermore, the requirements of 9 VAC 5 Chapter 40, Part II, Article 13, Emissions Standards for Kraft Pulp Mills (Rule 4-13) apply to the B&W Recovery Boiler (Ref. No. CR05) and the Smelt Dissolving Tank (Ref. No. CR06). These requirements, including emission limits, are set forth in the Title V permit.

Opacity. Except for the B&W Recovery Boiler (Ref. No. CR05), the opacity requirements given in 9 VAC 5-50-80 apply to the Chemical Recovery portion of the facility. These requirements (20% opacity limit, except for one six minute period in any one hour in which visible emissions shall not exceed 30% opacity) are set forth in the Title V permit. The opacity limits for the B&W Recovery Boiler (Ref. No. CR05) are based on the requirements given in 9 VAC 5-40-1710 (35% opacity limit); this limit is set forth in the Title V permit.

Additional Requirements. The B&W Recovery Boiler (Ref. No. CR05) is required to be properly operated and maintained in order to minimize emissions; boiler operators must be trained in the proper operation of the B&W Recovery Boiler (Ref. No. CR05).

#1 Paper Machine. There are no applicable federal requirements for the #1 Paper Machine. The applicable opacity requirement, given in 9 VAC 5-50-80 (20% opacity limit,

except for one six minute period in any one hour in which visible emissions shall not exceed 30% opacity) is set forth in the Title V permit.

#2 Paper Machine. The #2 Paper Machine has a permit dated May 12, 1992, as amended October 5, 1994 and February 22, 1995. The limits set forth in that permit, including a production limit and emission limits, are carried forward into the Title V permit. In addition, the applicable opacity requirement, given in 9 VAC 5-50-80 (20% opacity limit, except for one six minute period in any one hour in which visible emissions shall not exceed 30% opacity) is set forth in the Title V permit.

Wastewater Treatment Plant. There are no applicable federal or state requirements for the Wastewater Treatment Plant**.**

PERIODIC MONITORING

FUEL BURNING EQUIPMENT

North and South Package Boilers

Emission Limits. The B&W Package Boiler – North (Ref. No. BLR01) and the B&W Package Boiler – South (Ref. No. BLR02) have short-term emission limits for SO_2 and PM, based on the limitations set forth in 9 VAC 5-40-930 and 9 VAC 5-40-900, respectively.

For SO_2, there is a limit in the permit on the maximum amount of sulfur allowed in the residual oil (2.5%). Per the AP-42 emission factor and the maximum rated capacity of each boiler, the maximum hourly emissions of SO_2 would be 587.6 lbs/hr. This is less than the short-term limit specified in the permit (ie., 592.9 lb/hr). Furthermore, it is not expected that the source would ever run either boiler at maximum capacity AND using residual oil with the maximum sulfur content specified; thus, the calculated emission rate, above, is truly an absolute worst-case rate. Therefore, the periodic monitoring for SO2 from the North and South boilers is considered satisfied by the fuel sulfur content and throughput recordkeeping requirements included in the Title V permit.

For PM, the maximum emission rate per the AP-42 emission factor and the maximum rated capacity of each boiler is 0.17 lbs/MMBtu, as opposed to the permitted emission limit of 0.22 lbs/MMBtu. Therefore, the permitted limit is more than 20% higher than the calculated maximum emission rate, and the periodic monitoring for PM from the North and South boilers is considered satisfied

Opacity. Periodic monitoring requirements for opacity from the B&W Package Boiler – North (Ref. No. BLR01) and the B&W Package Boiler – South (Ref. No. BLR02) combined stack are based on weekly observation for the presence or absence of visible emissions. In the event visible emissions are observed, corrective action is required. If corrective actions do not result in the absence of visible emissions, Visible Emissions Evaluations in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) are required to demonstrate compliance with the applicable opacity limit. If any of the 15-second observations exceed the applicable limit, the VEE shall be conducted for a total of

60 minutes. The permittee will keep a log of observations, any corrective actions taken, and any VEE recordings.

Other Requirements. The source will be required to keep records of all operation information, sufficient to calculate annual emissions, operating procedures, maintenance schedules, service records, and malfunctions of equipment. In addition, the amount of residual oil consumed in the B&W Package Boiler – North (Ref. No. BLR01) is required to be kept on an annual basis to show compliance with the annual fuel consumption limit.

With the emissions limitations, opacity observations, and required recordkeeping, it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

Spare Package Boiler

Emission Limits. The B&W Package Boiler – Spare (Ref. No. BLR03) has emission limits for PM, PM-10, CO, and VOCs. These emission limits are based on current standard emission factors from AP-42 and are applied to the spare boiler operating at capacity. Therefore, these limits are not expected to be exceeded and periodic monitoring requirement is considered satisfied by the fuel quality and throughput monitoring and recordkeeping requirements included in the Title V permit.

The B&W Package Boiler – Spare (Ref. No. BLR03) also has emission limits for SO_2 and NOx. These emission limits are based on current standard emission factors from AP-42 and are applied to the spare boiler operating at capacity. Furthermore, the Title V permit includes the requirement to stack test the B&W Package Boiler – Spare (Ref. No. BLR03) once per permit term if the calculated annual emissions of these pollutants exceeds 50% of the permitted annual emissions. Therefore, these limits are not expected to be exceeded and periodic monitoring requirement is considered satisfied by the fuel quality and throughput monitoring and recordkeeping requirements, and the periodic testing requirements included in the Title V permit.

Opacity. Periodic monitoring requirements for opacity from the B&W Package Boiler – Spare (Ref. No. BLR03) stack is based on weekly observation for the presence or absence of visible emissions. In the event visible emissions are observed, corrective action is required. If corrective actions do not result in the absence of visible emissions, Visible Emissions Evaluations in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) are required to demonstrate compliance with the applicable opacity limit. If any of the 15-second observations exceed the applicable limit, the VEE shall be conducted for a total of 60 minutes. The permittee will keep a log of observations, any corrective actions taken, and any VEE recordings.

Other Requirements. The source will be required to keep records of all operation information, sufficient to calculate annual emissions, operating procedures, maintenance schedules, service records, and malfunctions of equipment, and to obtain and keep all fuel supplier certifications. In addition, the amount of residual oil consumed in the B&W Package Boiler – North (Ref. No. BLR01) is required to be kept on an annual basis to show compliance with the annual fuel consumption limit.

With the emissions limitations, opacity observations, and required recordkeeping, it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

Combination Boiler

Emission Limits. The Foster Wheeler Combination Boiler (Ref. No. BLR05) has emission limits for Particulate Matter (PM), PM-10, Sulfur Dioxide (SO_2), Nitrogen Oxides (NOx), Carbon Monoxide (CO), Volatile Organic Compounds (VOCs), Formaldehyde, Cobalt, and HCl. These limits are the worst case fueling scenarios for the boiler firing at capacity, and using emission factors from AP-42, the EPA document "Burning Tires for Fuel and Tire Pyrolysis," and vendor guarantees.

Furthermore, for PM and PM-10, the source is required to have an electrostatic precipitator (ESP) on the Foster Wheeler Combination Boiler (Ref. No. BLR05) stack, and must continuously measure the electrical operating parameters of the ESP (by field). Also, this boiler is required to have a continuous opacity monitor. Finally, the Title V permit includes the requirement to stack test the Foster Wheeler Combination Boiler (Ref. No. BLR05) once per permit term.

Therefore, these limits are not expected to be exceeded and the periodic monitoring requirement is considered satisfied by the fuel throughput recordkeeping requirements, the ESP operating parameter monitoring requirements, the opacity monitoring requirements, and the periodic testing requirement in the current Title V permit.

Opacity. The Foster Wheeler Combination Boiler (Ref. No. BLR05) is required to install and maintain a continuous emission monitoring system to record opacity from the boiler. In addition to installation of the monitoring system, the source is further required to audit the system on a periodic basis to assure that the monitoring system is operating in compliance with the calibration error specifications. The data from the continuous emission monitoring system shall be kept on file, and provided to the Virginia Department of Environmental Quality upon request. The requirement to have a continuous emission monitoring system fulfills the periodic monitoring requirement for opacity, for the purposes of this permit.

Other Requirements. The source will be required to keep records of all operation information, sufficient to calculate annual emissions, operating procedures, maintenance schedules, service records, and malfunctions of equipment, and the weight percent of MSW combusted in the boiler.

With the emissions limitations, continuous emission monitoring system, and required recordkeeping, it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

PROCESS EQUIPMENT

Woodyard

There are no periodic monitoring requirements for this portion of the facility.

Unbleached Pulp Mill

Opacity. Periodic monitoring requirements for opacity from Unbleached Pulp Mill equipment are based on weekly observation for the presence or absence of visible emissions. In the event visible emissions are observed, corrective action is required. If corrective actions do not result in the absence of visible emissions, Visible Emissions Evaluations in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) are required to demonstrate compliance with the applicable opacity limit. If any of the 15-second observations exceed the applicable limit, the VEE shall be conducted for a total of 60 minutes. The permittee will keep a log of observations, any corrective actions taken, and any VEE recordings.

Other Requirements. MACT I (ie., 40 CFR 63 Subpart S) includes extensive monitoring and recordkeeping requirements for the LVHC portion of the pulp mill, and these requirements are included in the current Title V permit. Also, the source is required to keep records of all operation information, sufficient to calculate annual emissions, and of malfunctions of any equipment that may cause a violation of any portion of the permit.

With the MACT I requirements, the opacity observations, and required recordkeeping, it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

Chemical Recovery

Emission Limits. The B&W Recovery Boiler (Ref. No. CR05) and the Smelt Dissolving Tank (Ref. No. CR06) each have emission limits for Particulate Matter based on 9 VAC 5 Chapter 40 Part 11, Article 13, Emission Standards for Kraft Pulp Mills. The B&W Recovery Boiler (Ref. No. CR05) is also required to operate an electrostatic precipitator to control particulate emissions. The use of the control device will allow the B&W Recovery Boiler (Ref. No. CR05) to meet the PM emission limit. Recent stack testing of the Recovery Boiler (Ref. No. CR05) indicates that the actual emission rate is approximately 0.14 lb per ton of pulp (ie., more than 20 times lower than the emission standard.) The Smelt Dissolving Tank (Ref. No. CR05) is a relatively wet process, and thus will also be able to meet the applicable PM emission limit. Recent stack testing of the Smelt Dissolving Tank (Ref. No. CR06) indicates that the actual emission rate is approximately 0.05 lb per ton of pulp (ie., more than 15 times lower than the emission standard.) Therefore, it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

Opacity. Periodic monitoring requirements for opacity from Chemical Recovery portion of the facility, including the B&W Recovery Boiler (Ref. No. CR05) are based on weekly observation for the presence or absence of visible emissions. In the event visible emissions are observed, corrective action is required. If corrective actions do not result in the absence of visible emissions, Visible Emissions Evaluations in accordance with EPA Method 9

(reference 40 CFR 60, Appendix A) are required to demonstrate compliance with the applicable opacity limit. If any of the 15-second observations exceed the applicable limit (35% for the B&W Recovery Boiler, 20% for all other Chemical Recovery equipment), the VEE shall be conducted for a total of 60 minutes. The permittee will keep a log of observations, any corrective actions taken, and any VEE recordings.

Other Requirements. MACT II (ie., 40 CFR 63 Subpart MM) includes extensive monitoring and recordkeeping requirements for the semichemical combustion unit portion of the pulp mill (ie., the B&W Recovery Boiler (Ref. No. CR05)), and these requirements are included in the current Title V permit. Also, the source is required to keep records of all operation information, sufficient to calculate annual emissions, and of malfunctions of any equipment that may cause a violation of any portion of the permit.

With the MACT II requirements, the emission limitations, opacity observations and required recordkeeping, it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

#1 Paper Machine

Opacity. Periodic monitoring requirements for opacity from the #1 Paper Machine are based on weekly observation for the presence or absence of visible emissions. In the event visible emissions are observed, corrective action is required. If corrective actions do not result in the absence of visible emissions, Visible Emissions Evaluations in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) are required to demonstrate compliance with the applicable opacity limit. If any of the 15-second observations exceed the applicable limit, the VEE shall be conducted for a total of 60 minutes. The permittee will keep a log of observations, any corrective actions taken, and any VEE recordings.

Other Requirements. The source is required to keep records of all operation information, sufficient to calculate annual emissions, and of malfunctions of equipment that may cause a violation of any portion of the permit.

With the opacity observations and required recordkeeping, it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

#2 Paper Machine

Emission Limits. The #2 Paper Machine has emission limits for VOCs specified in the Title V permit. The #2 Paper Machine does not have add-on controls for VOCs. A material balance on the amount of chemical(s) consumed, taking into account the volatile species present in the chemical(s), the percent volatile by weight of the chemical(s), and assuming 100% evaporation of all volatile species, is required by permit, and is considered to satisfy the periodic monitoring requirement.

Opacity. Periodic monitoring requirements for opacity from the #2 Paper Machine are based on weekly observation for the presence or absence of visible emissions. In the event visible emissions are observed, corrective action is required. If corrective actions do not result in the absence of visible emissions, Visible Emissions Evaluations in accordance with

EPA Method 9 (reference 40 CFR 60, Appendix A) are required to demonstrate compliance with the applicable opacity limit. If any of the 15-second observations exceed the applicable limit, the VEE shall be conducted for a total of 60 minutes. The permittee will keep a log of observations, any corrective actions taken, and any VEE recordings.

Other Requirements. The source is required to keep records of the amount of paper produced by the #2 Paper Machine annually. Furthermore, the source is required to keep records of all operation information, sufficient to calculate annual emissions, and of malfunctions of equipment that may cause a violation of any portion of this permit.

With the emission limitations, the opacity observations and required recordkeeping, it is felt that the margin of compliance is sufficient to assure compliance with the permitted limits.

Wastewater Treatment Plant
There are no periodic monitoring requirements for this portion of the facility.

LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the Commonwealth of Virginia Federal Operating Permit Regulations for the purposes of Title V of the Federal Clean Air Act (9 VAC 5 Chapter 80 Article 1), and underlying applicable requirements in other state and federal rules. Applicable requirement means all of the following as they apply to emission units in a Title V source:

a. Any standard or other requirement provided for in the State Implementation Plan or the Federal Implementation Plan, including any source-specific provisions such as consent agreements or orders.

b. Any term or condition of any preconstruction permit issued pursuant to 9 VAC 5-80-10, Article 8 (9 VAC 5-80-1700 et seq.) of this part or 9 VAC 5-80-30 or of any operating permit issued pursuant to 9 VAC 5 Chapter 80 Article 5, except for terms or conditions derived from applicable state requirements or from any requirement of these regulations not included in the definition of applicable requirement.

c. Any standard or other requirement prescribed under these regulations, particularly the provisions of 9 VAC 5 Chapter 40 (9 VAC 5-40-10 et seq.), 9 VAC 5 Chapter 50 (9 VAC 5-50-10 et seq.) or 9 VAC 5 Chapter 60 (9 VAC 5-60-10 et seq.), adopted pursuant to requirements of the federal Clean Air Act or under ' 111, 112 or 129 of the federal Clean Air Act.

d. Any requirement concerning accident prevention under ' 112(r)(7) of the federal Clean Air Act.

e. Any compliance monitoring requirements established pursuant to either ' 504(b) or ' 114(a)(3) of the federal Clean Air Act or these regulations.

f. Any standard or other requirement for consumer and commercial products under ' 183(e) of the federal Clean Air Act.

g. Any standard or other requirement for tank vessels under ' 183(f) of the federal Clean Air Act.

h. Any standard or other requirement in 40 CFR Part 55 to control air pollution from outer continental shelf sources.

i. Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the federal Clean Air Act, unless the administrator has determined that such requirements need not be contained in a permit issued under this article.

j. With regard to temporary sources subject to 9 VAC 5-80-130, (i) any ambient air quality standard, except applicable state requirements, and (ii) requirements regarding increments or visibility as provided in Article 8 (9 VAC 5-80-1700 et seq.) of this part.

k. Any standard or other requirement of the acid deposition control program under Title IV of the Clean Air Act or the regulations promulgated thereunder.

l. Any standard or other requirement governing solid waste incineration under ' 129 of the Clean Air Act.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 9 VAC 5 Chapter 80 Article 1 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the state but is not federally-enforceable is identified in the draft Title V permit as such.

REQUEST FOR VARIANCES OR ALTERNATIVES:

None

COMMENT PERIOD:

The public notice appeared in the NEWS & ADVANCE on June 13, 2001, and in the NEW ERA-PROGRESS on June 20, 2001.

Beginning Date: June 13, 2001
Ending Date: July 23, 2001

All written comments should be addressed to the following individual and office:

Department of Environmental Quality
South Central Regional Office
7705 Timberlake Road
Lynchburg, VA 24502
Phone: (804) 582-5120 Fax: (804) 582-5125

PROCEDURE FOR REQUESTING PUBLIC HEARING:

During the public comment period any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for a public hearing shall be in writing to the above address and shall state the nature of the issues proposed to be raised in the hearing. The Director shall grant such a request for a hearing if he concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.